

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

14 Cr. 68 (KBF)

- against - :

ROSS ULBRICHT, :

Defendant. :

**DECLARATION OF  
JOSHUA L. DRATEL, ESQ.  
IN SUPPORT OF DEFENDANT  
ROSS ULBRICHT'S  
POST-TRIAL MOTIONS**

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Joshua L. Dratel, Esq., pursuant to 28 U.S.C. §1746, hereby affirms under penalty of perjury:

1. I am an attorney, and I represent defendant Ross Ulbricht in the above-captioned case. I make this Declaration in support of Mr. Ulbricht's post-trial motions for a new trial, pursuant to Rule 33, Fed.R.Crim.P., and to renew his motion(s) to suppress the fruits of certain searches and seizures performed by the government.

2. The bases for these motions are set forth in detail in the accompanying Memorandum of Law. Also, it is respectfully requested that the facts set forth within the Memorandum of Law be incorporated by reference in this Declaration.

3. Attached as Exhibits to this Declaration, and relevant to Mr. Ulbricht's motions, are the following:

- (a) a catalogue of exculpatory 3500 material relevant to the motions, attached as Exhibit 1;
- (b) a chart of the additions, deletions and modifications of government exhibits, attached as Exhibit 2; and

(c) January 8, 2015, email from AUSA Serrin Turner to Lindsay A. Lewis,  
attached as Exhibit 3.

WHEREFORE, it is respectfully requested that the Court grant Mr. Ulbricht's Motions in  
their entirety.

I declare under penalty of perjury that the foregoing is true and correct to the best of my  
knowledge and belief. 28 U.S.C. §1746. Executed March 6, 2015.

/S/ Joshua L. Dratel  
JOSHUA L. DRATEL